

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 21-CR-207

SEAN A. JOCHIMS,
Defendant.

DEFENDANT’S SENTENCING MEMORANDUM

Given Mr. Jochims’ strong community connections, excellent work history, acceptance of responsibility, and willingness to change his behavior, the joint sentencing recommendation of 48 months of imprisonment followed by 5 years of supervised release is sufficient, but not greater than necessary. Mr. Jochims pleaded guilty to one count of possession of child pornography. This is Mr. Jochims’ first and only offense. He has accepted full responsibility for his behavior and wishes to rebuild his life once he serves his prison sentence.

I. Mr. Jochims’ History and Characteristics.

Mr. Jochims is a longstanding contributing member of his community. He has lived in southeastern Wisconsin his entire life, helped raise three wonderful and highly successful children, and built a flourishing medical practice in Waukesha County through which he has treated thousands of patients.

Mr. Jochims describes his childhood as “loving, stable, and supportive” (PSR ¶44). He remains close with his elderly parents and two siblings. Although Mr. Jochims and his wife, Elizabeth Shanahan, divorced in July 2015, they maintain an extremely

close relationship and get along well. As for Mr. Jochims' children, two are currently in college and the youngest goes to Arrowhead High School. Ms. Shanahan believes Mr. Jochims is "intelligent, motivated, and a good father," and he was actively involved in raising them as children (PSR ¶52).

Mr. Jochims has been a medical provider for his community for over two decades. He worked at Neurological Associates of Waukesha for eight years before starting his own practice, Neurological Wellness Clinic, in 2009 in Pewaukee, Wisconsin. The clinic focused on sleep disorders, Parkinson's Disease, concussions, and other neurological issues. During the roughly 13 years that the Neurological Wellness Clinic was open, Mr. Jochims provided care for thousands of patients and employed eight to nine staff members. The high quality of Mr. Jochims' work resulted in a steady stream of patient referrals. As the PSR reflects, Mr. Jochims has always been incredibly hard working and proud of the important medical care he provided. Entirely because of his criminal offense and the accompanying felony conviction, Mr. Jochims has voluntarily relinquished his medical license and closed Neurological Wellness Clinic

As a result of this conviction, Mr. Jochims has lost his reputation, livelihood, and freedom. He will never again be allowed to practice medicine of any kind. His many patients need to find a new provider. Because of Mr. Jochims' dramatic loss of income, society is losing a very high taxpayer. In short, many people, including society as a whole, have been negatively affected by Mr. Jochims' behavior.

Mr. Jochims has accepted full responsibility for his actions. He feels deep remorse and understands the consequences. Mr. Jochims will never reoffend for a number of reasons, as pointed out in his acceptance of responsibility statement. He is being punished

and will be imprisoned for 4 years. He also feels ashamed and remorseful, which will ensure he does not forget the lessons he has learned from this experience. Finally, Mr. Jochims has actively pursued treatment for the bipolar disorder he suffers from. He has also attended dozens of sessions with Joe Henger in order to receive sex offender treatment. He wishes to work on these issues so that he can continue to be a productive member of the community following his incarceration.

II. Judicial Recommendation for Prison Placement.

The defense is requesting that this Court recommend Mr. Jochims' placement in Federal Correctional Institution Milan (FCI Milan). Mr. Jochims prefers placement at FCI Milan because it is the closest low-security prison within 500 miles of his home in Delafield. This will allow his elderly parents and children to visit him, so he will be able to remain actively involved in their lives. As the Court can see from the PSR, Mr. Jochims' father recently broke his neck, which requires significant assistance. Mr. Jochims has been heavily involved in his father's recovery. Placement at FCI Milan will present a close enough location that Mr. Jochims' father will be able to make the journey to see his son. Mr. Jochims also requests a judicial recommendation for FCI Milan because of several programs it offers. Milan offers adult continuing education and vocational training/apprenticeships in carpentry, electric work, and plumbing. This would be useful to Mr. Jochims as he will need to find a new career after serving his sentence. Additionally, FCI Milan provides the opportunity to participate in the Life Connections Program, which would allow Mr. Jochims to continue developing his faith.

Dated at Waukesha, Wisconsin this 28th day of January, 2022.

Respectfully Submitted,
KUCHLER & COTTON, S.C.

/s/ Anthony D. Cotton
State Bar No. 1055106
tony@kuchlercotton.com
1535 E. Racine Ave.
Waukesha, WI 53186
(262) 542-4218
7000 W. North Ave.
Wauwatosa, WI 53213